

0031

Incoming

C0250005

#3371

OK

From: "Chris McCourt" <CMcCourt@altoncoal.com>
To: "Daron Haddock" <DARONHADDOCK@utah.gov>, "Jim Smith" <JIMDSMITH@utah.gov>
CC: "Dana Dean" <danadean@utah.gov>, <STEVEALDER@utah.gov>
Date: 10/20/2009 7:38 AM
Subject: RE: "Housekeeping Items" and Conditions
Attachments: UPDES Outfall Locations.pdf

Jim and Daron,

I had meant to provide the UPDES information to you when I was at your office last week but I became busy and forgot. The UPDES Permit number is UTG040027 and it is a general permit for coal mining. Attached is a map showing the outfall locations.

My understanding is that this is not required in R645-301 as part of the permit application so let me know if this takes care of the information needs related to UPDES. If the Division is requiring this as part of the permit application, please refer me to the regulation that makes this information a requirement.

Thanks,
Chris

-----Original Message-----

From: Dana Dean [mailto:danadean@utah.gov]
Sent: Monday, October 19, 2009 6:33 PM
To: Chris McCourt
Cc: Daron Haddock; Jim Smith; Steve Alder
Subject: "Housekeeping Items" and Conditions

Chris,

As I told you on the phone, John requested that I let you know what the "housekeeping items" referred to in our approval are. I am copying Jim and Daron, so that if there are questions as to where, in the regs, the items are required they can help us to answer them. I will wait to hear back from you tomorrow.

Thanks,
Dana

Housekeeping Items
Required Supporting documentation to be provided before permit issuance:

R645 - 301- 622.300 requires strike and dip be shown on a map. Strike and dip are not evident on Drawings 6-1 and 6-6 (see statement in Section 622.300). Clearly indicate strike and dip on Drawings 6-1 and 6-6, or if strike and dip are shown on other maps, correct the reference in Section 622.300.

Add information on surface-water monitoring points SVWOBS-1 and SVWOBS-2 to Section 724.200 and appropriate maps.

Clear and concise issues to be corrected before permit issuance:

- * Add Drawings 15 and 15B to the Table of Contents for Chapter 7.
- * Identify the UPDES permit number and the locations of the UPDES permit discharge points.
- * Clarify that silt fencing treating runoff from Watershed 6 will be placed on the upslope or east side of the relocated channel, rather than on the downslope or west side as indicated on Drawing 5-26.
- * Update Section 731.600 Stream Buffer Zones to include *ephemeral streams that drain a watershed of at least one square mile* (R645-301-731.600 was reworded after the Applicant's initial submittal).
- * Clarify where A7-10 PLATE 1.pdf, A7-10 PLATE 2.pdf, DWG. PLATE 1.pdf, and DWG. PLATE 2.pdf are to be located in the MRP and their purpose. These plates were included in the 08/27/2009 submittal. Only Plate 1 is listed on the C2 form, which indicates Plate 1 is part of Appendix 7-7. The other 3 plates are not on the C2 form. All 4 appear to be part of Appendices 7-9 or 7-10. Appendix 7-10 lists *Sheet A7-10 Plate 2* in its REFERENCES, but A7-10 Plate 1 does not appear to be mentioned anywhere in the MRP.
- * Page 5-59 still contains a reference to grading within 180 days which must be corrected to be in compliance with the requirements of R645-301-553.

Permit Conditions

1. Alton Coal Development, LLC will submit water quality data for the Coal Hollow Mine in an electronic format through the Electronic Data Input web site, <http://linux1.ogm.utah.gov/cgi-bin/appx-ogm.cgi>.
2. The applicant has proposed to establish a compacted shale barrier along pit 15 if substantial flows are intercepted into the mine. The Applicant/Operator of the Coal Hollow Mine will be required to assess and submit plans to curtail and reestablish groundwater movement in the event large volumes of groundwater (greater than 1 cfs) is intercepted in any of the other mine pits.
3. When mining is done in each pit, it is to be filled and reclaimed. Porous fill material must not be left adjacent to the alluvial aquifers, because that would facilitate continuous drainage from the aquifers into the fill in the pits. A grout curtain or geomembrane would be possible methods of blocking ground-water flow across this boundary, but the Applicant may devise other methods to achieve this purpose. The applicant must provide a design for the margin, where the pits meet the undisturbed alluvium, and specific techniques to be used to minimize drainage from the alluvium into the fill in the reclaimed pits.
4. The Applicant will be required to monitor for selenium where water leaves the minesite, during operational and reclamation phases.
5. The Applicant will be required to evaluate discharges from the

mine to determine any impacts to the designated AVF on Kanab Creek. An annual finding should be placed in the Annual Report during operation and reclamation of any adverse impacts to the channel, diminution of water quality and impacts to wildlife.

6. The Applicant must receive an Air Quality Approval Order prior to conducting surface mining. The information provided in the application may meet the requirements of the Air Quality rules for R645-301-423.200, however, the Division does not provide training for permitting staff or inspectors in the application of EPA Method 9.

7. Satisfactory compliance with the Alton Sage-Grouse Habitat Protection plan is required. Alton Coal Development, LLC will use best technology currently available to achieve the objectives of the plan in order to minimize the disturbances and adverse impacts to the sage grouse and related habitat and to enhance those resources where practicable. ACD will cooperate with the Division in consultation with the state and federal wildlife agencies to develop reasonable practices and methods as are determined to be necessary to implement the plan and to measure success and to achieve the goals of the plan."

